

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA,

Plaintiff,

v.

HI JI,
LI MINJUN,
TU LAN,
ZHU FENG,

also known as "Johnny Zhu,"
KUANG ZEBIN,
also known as "Vincent Kuang,"
MICHAEL MCMAHON,
Zhai YONGQIANG,
ZHENG CONGYING and
ZHU YONG,

also known as "Jason Zhu,"

Defendants.

Case No. 1:21-cr-00265 (PKC) (S-1)

**[PROPOSED] ORDER GRANTING
DEFENDANT MICHAEL
MCMAHON'S MOTION FOR
DISCOVERY AND AN EVIDENTIARY
HEARING REGARDING
PROSECUTORIAL MISCONDUCT**

THIS MATTER having come before the Court upon the Motion for Discovery and an Evidentiary Hearing Regarding Prosecutorial Misconduct filed by defendant Michael McMahon, by Gibbons P.C. (Lawrence S. Lustberg, Esq. and Genna A. Conti, Esq., appearing), and the Court having considered the submissions of the parties and the arguments of counsel, and for good cause shown:

IT IS on this _____ day of _____ 2022,

ORDERED that Defendant's Motion for Discovery and an Evidentiary Hearing Regarding Prosecutorial Misconduct shall be and is hereby **GRANTED**;

IT IS FURTHER ORDERED that an evidentiary hearing regarding Mr. McMahon's allegations of the Government's Prosecutorial Misconduct be held on _____; and

IT IS FURTHER ORDERED that the Government must provide Mr. McMahon with discovery, including but not limited to documents and communications, discussing Mr. McMahon's involvement in the Bergrin case among those investigating or prosecuting the instant matter, as well as any and all information regarding the Government's motive for investigating, indicting and prosecuting Mr. McMahon in the instant matter, on or before _____, 2022.

Honorable Pamela K. Chen
United States District Judge